

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
v. )  
ROSS MCLELLAN, )  
Defendant )  
No. 16-10094-LTS

**DEFENDANT ROSS MCLELLAN'S MOTION TO FILE DEPOSITIONS UNDER SEAL**

Now comes the defendant Ross McLellan in the above-captioned case and respectfully moves that this Honorable Court permit him to file the depositions of Krystyna Beck and Simone Paul under seal.

As reason therefor, McLellan states:

1. He has filed today his Motion to Admit Foreign Deposition Testimony into Evidence, seeking to admit the deposition testimony of Krystyna Beck and Simone Paul into evidence at the trial of this case. To assist the Court in ruling on that motion, McLellan wishes to provide the Court with a copy of both depositions.

2. Due to the uncertain scope of the applicable protective orders in *SEC v. McLellan*, No. 16-cv-10874 (DPW), in which the depositions were taken, McLellan, in an abundance of caution, respectfully requests this Honorable Court to allow him to file the depositions under seal.

## **COMPLIANCE WITH LOCAL RULE 7.1(a)(2)**

The Government does not oppose this request.

Respectfully submitted,  
By his attorneys,

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**CERTIFICATE OF SERVICE**

I, Martin G. Weinberg, hereby certify that on this 21st day of May, 2018, I caused the within Motion to be served on all registered participants through its filing with this Court's CM/ECF system.

/s/ Martin G. Weinberg  
Martin G. Weinberg